



South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

December 10, 2001
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File No.: G25
10CFR50.90
STI: 31375790

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-0001

South Texas Project
Units 1 & 2
Docket Nos. STN 50-498, STN 50-499
Application for Technical Specification Change Regarding
Missed Surveillances Using the Consolidated
Line Item Improvement Process (LIIP)

In accordance with the provisions of 10 CFR 50.90, STP Nuclear Operating Company (STPNOC) herewith transmits an application for amendment to Facility Operating Licenses STN 50-498, STN 50-499 for the South Texas Project.

The proposed amendment would modify the Technical Specification requirements for missed surveillances in Specification 4.0.3 as well as modify the associated Technical Specification Bases. The changes are consistent with Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) STS change TSTF-358, Revision 6. The availability of this Technical Specification improvement was published in the Federal Register on September 28, 2001 (Federal Register Notice 66 FR 49714) as part of the Consolidated Line Item Improvement Process (LIIP).

STPNOC submits this license amendment application in conjunction with an industry consortium of five plants as a result of a mutual agreement known as Strategic Teaming and Resource Sharing (STARS). The STARS group consists of the five plants operated by TXU Electric, Union Electric Company, Wolf Creek Nuclear Operating Corporation, Pacific Gas and Electric Company, and STP Nuclear Operating Company. In addition, Arizona Public Service Company will also be submitting a similar license amendment application. The other members of the above group can be expected to submit license amendment requests similar to this one. STPNOC will be adopting a Technical Specification Bases Control Program due to the vintage of our Technical Specifications.

Attachment 1 provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications. Attachment 2 provides the

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existing Technical Specification pages marked up to show the proposed change. Attachment 3 provides the existing Technical Specification Bases pages marked up to show the proposed change. Attachment 4 provides revised Technical Specification pages. Please note that Attachment 3 is provided for information only; however, STPNOC will adopt these Technical Specification Bases changes upon implementation of the license amendment. This is the only commitment associated with this amendment application.

The South Texas Project Plant Operations Review Committee has reviewed the proposed amendment and recommended it for approval. The South Texas Project Nuclear Safety Review Board has reviewed and approved the proposed change.

This amendment application does not involve a significant hazard consideration as determined per 10CFR50.92. Pursuant to 10CFR51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of this amendment.

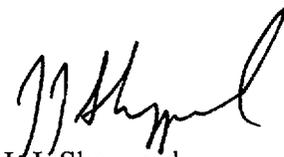
Approval of this amendment application is requested by June 3, 2002. Once approved, this amendment will be implemented within 60 days. In accordance with 10CFR50.91, a copy of this amendment application is being provided to the State of Texas.

The only commitment made in this letter is to establish a Bases Control Program.

If you have any questions on this amendment application, please contact either Mr. Scott Head at (361) 972-7136 or me at (361) 972-8757.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 12/10/01


J.J. Sheppard
Vice President,
Engineering & Technical Services

MKJ/

Attachments:

- 1 - Description and Assessment
- 2 - Proposed Technical Specification Changes
- 3 - Proposed Technical Specification Bases Changes (for information only)
- 4 - Revised Technical Specification Pages

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U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
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Attachment 1

Description and Assessment

1.0 Introduction

The proposed amendment would revise South Texas Project Technical Specification 4.0.3 requirements for missed surveillances consistent with the NRC-approved Industry/Technical Specification Task Force (TSTF) STS change TSTF-358, Revision 6. The proposed change is being submitted in conjunction with the Consolidated Line Item Improvement Process (CLIIP).

2.0 Description of Proposed Change

The proposed amendment would revise Technical Specification requirements for missed surveillances in Specifications 4.0.1 and 4.0.3. STPNOC proposes to make the following three specific changes to accommodate the changes addressed by the CLIIP.

- Convert Specifications 4.0.1 and 4.0.3 from current STP Technical Specifications format to Improved Technical Specifications format
- Incorporate the changes proposed by TSTF-358, revision 6 (CLIIP)
- Incorporate a Bases Control Program into Section 6.0, Administrative Controls

3.0 Background

Current STP Technical Specifications allow a delay period of up to 24 hours or up to the limit of the specified surveillance interval, whichever is less, to perform a missed surveillance prior to meeting the associated ACTION requirements. The proposed change, which is based on industry and NRC-approved TSTF-358, Revision 6, would modify this delay period to 24 hours or up to the specified surveillance interval, whichever is greater. A risk evaluation would be performed for any missed surveillance delayed greater than 24 hours. A missed surveillance requiring a Mode change or other change in plant conditions would be performed at the first reasonable opportunity. The benefit of this change would be reduction of the need to apply for regulatory relief for a missed surveillance and the associated need to subject the unit to otherwise unnecessary plant transients or shutdowns. The availability of this Technical Specification improvement was published in the Federal Register on September 28, 2001 (Federal Register Notice 66 FR 49714) as part of the (CLIIP).

Due to the vintage of the STP Technical Specifications, incorporation of the changes in the CLIIP will entail three areas of change. First, STP proposes to modify the wording of the current Specifications 4.0.1 and 4.0.3 to be consistent with NUREG-1431, Revision 2. These changes are necessary in order to make the current STP Technical Specifications compatible with the proposed changes of TSTF-358. Second, Specification 4.0.3 will be modified in accordance with the CLIIP and, upon approval of the proposed changes, the associated Bases will be revised. Finally, since STP has not fully implemented the Improved Technical Specifications, STP proposes to incorporate a Bases Control Program in Section 6.0 of the Technical Specifications.

4.0 Safety Evaluation

Conversion to Improved Technical Specification Format

Specifications 4.0.1 and 4.0.3 are being modified to be consistent with NUREG-1431, Revision 2, Surveillance Requirements 3.0.1 and 3.0.3. These changes are necessary to make the current STP Technical Specifications compatible with the proposed changes of TSTF-358, Revision 6. These changes are only administrative in nature.

Incorporation of TSTF-358, Revision 6

STPNOC has reviewed the proposed NRC safety evaluation dated June 14, 2001, as modified in response to the comments noticed on September 28, 2001, as part of the CLIIP. This review included a review of the NRC staff's evaluation, as well as the supporting information provided to support TSTF-358. STPNOC has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to STP and justify this amendment for incorporation of the changes to the STP Technical Specifications.

Incorporation of Bases Control Program

STP has not implemented Improved Technical Specifications, and therefore as required by the CLIIP, proposes to incorporate a Bases Control Program into Section 6.0. This change is only administrative in nature.

5.0 No Significant Hazards Consideration

In accordance with the criteria set forth in 10 CFR 50.92, STP has evaluated these proposed TS changes and determined they involve no significant hazards consideration. The following is provided in support of this conclusion:

Conversion to Improved Technical Specification Format

- 1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?**

The proposed change involves rewording of the existing Technical Specifications to be consistent with NUREG-1431, Revision 2. These modifications involve no technical changes to the existing Technical Specifications. As such, these changes are administrative in nature and do not affect initiators of analyzed events or assumed mitigation of accident or transient events. Therefore, these changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed change involves rewording of the existing Technical Specifications to be consistent with NUREG-1431, Revision 2. The change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or changes in methods governing normal plant operation. The changes will not impose any new or different requirements or eliminate any existing requirements. Therefore, the changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does this change involve a significant reduction in margin of safety?

The proposed change involves rewording of the existing Technical Specifications to be consistent with NUREG-1431, Revision 2. The changes are administrative in nature and will not involve any technical changes. The changes will not reduce a margin of safety because they have no impact on any safety analysis assumptions. Also, since these changes are administrative in nature, no question of safety is involved. Therefore, the changes do not involve a significant reduction in a margin of safety.

Incorporation of TSTF-358, Revision 6

STPNOC has reviewed the no significant hazards consideration determination published in the Federal Register as part of the CLIIP. STPNOC has concluded that the determination presented in the Federal Register notice is applicable to the South Texas Project and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

Incorporation of Bases Control Program

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed change involves incorporation of the NUREG-1431, Revision 2, Bases Control Program requirements into the STP Technical Specifications. These modifications involve no technical changes to the existing Technical Specifications. As such, these changes are administrative in nature and do not affect initiators of analyzed events or assumed mitigation of accident or transient events. Therefore, these changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed change involves incorporation of the NUREG-1431, Revision 2, Bases Control Program requirements into the STP Technical Specifications. The changes do not involve a physical alteration of the plant (no new or different type of equipment will be installed) or changes in methods governing normal plant operation. The changes will not impose any new or different requirements or eliminate any existing requirements. Therefore, the changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does this change involve a significant reduction in margin of safety?

The proposed change involves incorporation of the NUREG-1431, Revision 2, Bases Control Program requirements into the STP Technical Specifications. The changes are administrative in nature and will not involve any technical changes. The changes will not reduce a margin of safety because they have no impact on any safety analysis assumptions. Also, since these changes are administrative in nature, no question of safety is involved. Therefore, the changes do not involve a significant reduction in a margin of safety.

Based on the above, STPNOC has evaluated the proposed change to the Technical Specification and determined they involve no significant hazards consideration.

6.0 Environmental Considerations

The proposed Technical Specification change has been evaluated against the criteria for and identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. The proposed changes meet the criteria for categorical exclusion as provided for under 10 CFR 51.22(c)(10) in that they change recordkeeping, reporting, or administrative procedures or requirements. Thus, pursuant to 10 CFR 51.22(b), no environmental assessment or environmental impact statement need be prepared in connection with the issuance of an amendment to the Technical Specification incorporating the proposed changes of this request.

Attachment 2

Proposed Technical Specification Changes

Note to Reviewer - The format styles used in this markup are as follows:

- Bold formatting is used to identify changes made to incorporate standard Improved Technical Specification language into the current STP Technical Specifications.
- Highlighted formatting is used to identify CLIP-related changes.
- Italicized formatting is used to identify changes related to the incorporation of the Bases Control Program.

APPLICABILITY

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation, unless otherwise stated in an individual Surveillance Requirement.

Failure to perform a Surveillance, whether such a failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the Limiting Conditions for Operation. Failure to perform a Surveillance within the specified surveillance interval shall be failure to meet the Limiting Conditions for Operation except as provided in Specification 4.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval.

4.0.3 ~~Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. The time limits of the ACTION requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. The ACTION requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowed outage time limits of the ACTION requirements are less than 24 hours.~~ **Surveillance Requirements do not have to be performed on inoperable equipment.** **If it is discovered that a Surveillance was not performed within its specified surveillance interval, then compliance with the requirement to declare the Limiting Condition for Operation not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified surveillance interval, whichever is << CLIP >> less greater. This delay period is permitted to allow performance of the surveillance. << CLIP >> A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.**

If the Surveillance is not performed within the delay period, the Limiting Condition for Operation must immediately be declared not met, and the applicable Condition(s) must be entered. When the Surveillance is performed within the delay period and the Surveillance is not met, the Limiting Condition for Operation must immediately be declared not met and the applicable Condition(s) must be entered.

4.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation

Revised and
relocated to 4.0.1

has been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows:*

a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR Part 50, Section 50.55a(g)(6)(i);

*The Inservice testing requirement for exercise testing in the closed direction for the following listed valves shall not be required until the next plant shutdown to Mode 5 of sufficient duration to allow the testing or until the next refueling outage scheduled in March 1999. This exception shall apply to the following Unit 1 valves only: 1-CC-0319, 1-CV-0034A, 1-CV-0034B, 1-CV-0034C, 1-CV-0034D, 1-CV-0026, 1-FP-0943, and 1-IA-0541.

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Unit 1 - Amendment No. 21, 95

Unit 2 - Amendment No. 11, 82

Note to Reviewer – The reference listed as Specification 6.8.3 I)b in d. below may change pending approval of a separate STP license amendment request submitted in letter NOC-AE-01001146, dated November 5, 2001.

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

I) Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

- a. *Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.*
- b. *Licensees may make changes to Bases without prior NRC approval provided the changes do not require either of the following:*
 1. *A change in the TS incorporated in the license or*
 2. *A change to the updated FSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.*
- c. *The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the FSAR.*
- d. *Proposed changes that meet the criteria of Specification 6.8.3 I)b above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).*

Attachment 3

Proposed Technical Specification Bases Changes (Information Only)

Note to Reviewer - The format styles used in this markup are as follows:

- Bold formatting is used to identify changes made to incorporate standard Improved Technical Specification language into the current STP Technical Specifications.
- Highlighted formatting is used to identify CLIIP-related changes.

STP Bases Changes (Information Only)

Specification 4.0.1 establishes the requirement that surveillances must be performed during the OPERATIONAL MODES or other conditions for which the requirements of the Limiting Conditions for Operation apply unless otherwise stated in an individual Surveillance Requirement. The purpose of this specification is to ensure that surveillances are performed to verify the operational status of systems and components and that parameters are within specified limits to ensure safe operation of the facility when the plant is in a MODE or other specified condition for which the associated Limiting Conditions for Operation are applicable.

Systems and components are assumed to be OPERABLE, when the associated Surveillance Requirements have been met. Nothing in this Specification, however, is to be construed as implying that systems or components are OPERABLE when:

- a. The systems or components are known to be inoperable, although still meeting the SRs; or**
- b. The requirements of the Surveillance(s) are known not to be met between required Surveillance performances.**

Surveillance Requirements do not have to be performed when the facility is in an OPERATIONAL MODE for which the requirements of the associated Limiting Condition for Operation do not apply unless otherwise specified. The Surveillance Requirements associated with a Special Test Exception are only applicable when the Special Test Exception is used as an allowable exception to the requirements of a specification.

Surveillance Requirements do not have to be performed on inoperable equipment because the ACTION requirements define the remedial measures that apply. However, the Surveillance Requirements have to be met to demonstrate that inoperable equipment has been restored to OPERABLE status.

Specification 4.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified surveillance interval. A delay period of up to 24 hours or up to the limit of the specified surveillance interval, whichever is <<CLIIP Change>> ~~less~~ **greater**, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with Specification 4.0.2, and not at the time that the specified surveillance interval was not met.

This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Action requirements or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements. <<CLIP Change>> When a Surveillance with a surveillance interval based not on time intervals, but upon specified unit conditions or operational situations, is discovered not to have been performed when specified, SR 4.0.3 allows the full delay period of 24 hours to perform the Surveillance.

Specification 4.0.3 also provides a time limit for completion of Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.

<<CLIP Change>> When a Surveillance with a surveillance interval based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, Specification 4.0.3 allows for the full delay period of up to the specified surveillance interval to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

Specification 4.0.3 provides a time limit for, and allowances for the performance of, Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.

Failure to comply with specified surveillance interval for the Specification is expected to be an infrequent occurrence. Use of the delay period established by Surveillance Requirement 4.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals. <<CLIP Change>> While up to 24 hours or the limit of the specified surveillance interval is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the licensee's Corrective Action Program.

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the entry into the ACTION requirements for the applicable Limiting Conditions for Operation begins immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and entry into the ACTION requirements for the applicable Limiting Conditions for Operation begins immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this Specification, or within the Allowed Outage Time of the applicable ACTIONS, restores compliance with Specification 4.0.1.

Attachment 4

Revised Technical Specification Pages

APPLICABILITY

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

Failure to perform a Surveillance, whether such a failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the Limiting Conditions for Operation. Failure to perform a Surveillance within the specified surveillance interval shall be failure to meet the Limiting Conditions for Operation except as provided in Specification 4.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval.

4.0.3 If it is discovered that a Surveillance was not performed within its specified surveillance interval, then compliance with the requirement to declare the Limiting Condition for Operation not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified surveillance interval, whichever is greater. This delay period is permitted to allow performance of the surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the Limiting Condition for Operation must immediately be declared not met, and the applicable Condition(s) must be entered. When the Surveillance is performed within the delay period and the Surveillance is not met, the Limiting Condition for Operation must immediately be declared not met and the applicable Condition(s) must be entered.

4.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation has been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows:*

a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR Part 50, Section 50.55a(g)(6)(i);

*The Inservice testing requirement for exercise testing in the closed direction for the following listed valves shall not be required until the next plant shutdown to Mode 5 of sufficient duration to allow the testing or until the next refueling outage scheduled in March 1999. This exception shall apply to the following Unit 1 valves only: 1-CC-0319, 1-CV-0034A, 1-CV-0034B, 1-CV-0034C, 1-CV-0034D, 1-CV-0026, 1-FP-0943, and 1-IA-0541.

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

l) Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.
- b. Licensees may make changes to Bases without prior NRC approval provided the changes do not require either of the following:
 1. A change in the TS incorporated in the license or
 2. A change to the updated FSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.
- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the FSAR.
- d. Proposed changes that meet the criteria of Specification 6.8.3 l)b above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).